

1 John M. Naylor
Nevada Bar No. 5435
2 Andrew J. Sharples
Nevada Bar No. 12866
NAYLOR & BRASTER
3 1050 Indigo Drive, Suite 200
Las Vegas, NV 89145
4 (T) (702) 420-7000
(F) (702) 420-7001
5 jnaylor@nblawnv.com
asharples@nblawnv.com
6

7 *Attorneys for Defendant*
Midland Credit Management, Inc.

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
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11 MIA L. RAMOS, an individual,

12 Plaintiff,

13 v.

14 MIDLAND CREDIT MANAGEMENT,
INC., a foreign corporation;

15 Defendant.
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Case No. 2:20-cv-01356-RFB-BNW

**STIPULATION AND ORDER TO EXTEND
TIME TO ANSWER COMPLAINT**

(FIRST REQUEST)

Complaint filed: July 23, 2020

19 Defendant Midland Credit Management, Inc. ("Midland") and Plaintiff Mia L. Ramos
20 ("Plaintiff"), by and through their respective counsel of record, hereby submit this stipulation to
21 extend the time for Midland to respond to Plaintiff's Complaint (ECF No. 1) pursuant to LR IA 6-
22 1.

23 Plaintiff filed her Complaint on July 23, 2020. (ECF No. 1). The current deadline for
24 Midland to respond to the Complaint is August 18, 2020. Plaintiff and Midland stipulate and agree
25 that Midland shall have until September 1, 2020 to file its responsive pleading.

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1 This is Midland's first request for an extension of time to respond to the Complaint and is
2 not intended to cause any delay or prejudice any party, but due to Midland's counsel recently being
3 retained and to provide an opportunity to review the allegations in the Complaint.

4 **IT IS SO STIPULATED.**

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6 DATED this 18th day of August 2020.

NAYLOR & BRASTER

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8 By: /s/ John M. Naylor

9 John M. Naylor (NBN 5435)
10 Andrew J. Sharples (NBN 12866)
1050 Indigo Drive, Suite 200
Las Vegas, NV 89145

11 *Attorneys for Defendant*
12 *Midland Credit Management, Inc.*

13 DATED this 18th day of August 2020.

LAW OFFICE OF KEVIN L. HERNANDEZ

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15 By: /s/ Kevin L. Hernandez

16 Kevin L. Hernandez (NBN 12594)
8872 S. Eastern Avenue, Suite 270
Las Vegas, Nevada 89123

17 *Attorney for Plaintiff Mia L. Ramos*

18 **IT IS SO ORDERED.**

19 20th
20 Dated this ___ day of August 2020.

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28 UNITED STATES MAGISTRATE JUDGE